



## **Department of Energy**

Idaho Operations Office  
850 Energy Drive  
Idaho Falls, Idaho 83401-1563

November 2002

**SUBJECT: Conclusions of the Supplement Analysis of the DOE Programmatic Spent Nuclear Fuel Management and INEL Environmental Restoration and Waste Management Programs EIS (1995 EIS)**

Dear Citizen:

The Record of Decision (ROD) for the DOE Programmatic Spent Nuclear Fuel Management and INEL Environmental Restoration and Waste Management Programs EIS (1995 EIS) left several decisions concerning INEEL proposed actions outstanding. That is, decisions were deferred "pending further project definition, funding priorities, or appropriate review under NEPA." In May 2000 a team of DOE-ID program representatives and subject area technical specialists (interdisciplinary team) as well as ANL-W and NR/IBO representatives was appointed to review whether decisions not made in the ROD were still planned, and whether these decisions could be made based on the analysis in the 1995 EIS.

To determine if these actions could be implemented based on the 1995 EIS, the team conducted a review in the form of a supplement analysis as provided by 10 CFR 1021.314(c). Also, in conjunction with conducting the supplement analysis of the 1995 EIS, the interdisciplinary team reviewed all DOE NEPA documentation complex wide to assess what INEEL actions and operations had been reviewed and what decisions had been made.

Based on the analysis that was performed, the interdisciplinary team's primary findings are as follows:

1. The 1995 EIS adequately informs DOE decision makers and the public of the environmental impacts and risks of actions within its scope. Actions and issues within its scope include those related to INEEL environmental restoration, waste management and spent nuclear fuel management. Subsequent environmental monitoring, such as that reported in INEEL Site Environmental Reports, provides supporting documentation for this finding.
2. The conclusion of the 1995 EIS regarding groundwater impacts is that no contamination will leave the INEEL in excess of federal standards. This conclusion was determined to still be valid based on the additional analysis performed. In addition to the analysis, ground water monitoring data continues to show a downward trend in measurable contamination.

The 1995 EIS stated that additional ground water analysis was needed. Since then, three major pieces of analysis have been completed (RWMC Composite Analysis, the Updated RWMC Performance Assessment, and the Waste Area Group 3 Remedial Investigation/Feasibility Study). Currently, a Performance Assessment and Composite Analysis for the High Level Waste Tanks at the INTEC and the Idaho High Level Waste and Facility Disposition Environmental Impact Statement ground water analysis are being completed. These analyses will address most of the outstanding source term for the INEEL.

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The 1995 EIS may not provide sufficient information on residual groundwater contamination to support D&D decisions that would leave significant amounts of radioactive contamination in the ground. This finding does not bring the adequacy of the 1995 EIS into question for decisions made in the ROD but means the impacts of onsite disposal or entombment of radioactively contaminated facilities (such as ETR and MTR) would at present be uncertain. That is, the alternative used to D&D these facilities may affect the allowable accumulated risk to groundwater at other sites and thereby limit ultimate cleanup options and increase cleanup costs at those sites. The D&D of these facilities may require additional NEPA analysis that addresses cumulative impacts of site-wide groundwater contamination from these decisions.

3. An EA or an EIS for any future action on the INEEL, that has the potential to contaminate groundwater, should include cumulative impacts on site-wide groundwater contamination from these decisions. This will ensure that these future projects will continue to protect groundwater resources consistent with federal, state, and local requirements.
4. An EA or an EIS for any future action on the INEEL that may be located in a floodplain should include the findings of a floodplain determination.
5. There is nothing lacking within the scope of the 1995 EIS that would compel preparation of a supplemental EIS.

The program and technical subject area reviews supporting these findings are compiled in the "Supplement Analysis of the 1995 EIS" (see attachment) that reviews the actions identified above.

If you have any questions concerning this document, please contact Jeff Perry at (208) 526-4570 or our NEPA Compliance Officer, Roger Twitchell at (208) 526-0776.



Warren E. Bergholz, Jr.  
Acting Manager

Attachment